Mid Coast Timber Supply Area
Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Mid Coast Forest District
Box 190, Sawmill Road
Hagensborg, B.C.
V0T 1H0

March, 2000

This is a summary of the public input received on the Timber Supply Review in the Mid Coast Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

104-01807/

Mid Coast Timber Supply Area

Background

As part of the review of timber supply in the Mid Coast Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Mid Coast TSA Data Package and Information Report in April 1998. The Information Report was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Mid Coast TSA. A 30-day review period, ending June 1, 1998, was provided for the public to comment on these documents.

In June 1999, the B.C. Forest Service released the 1999 Mid Coast TSA Analysis Report and Public Discussion Paper. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended August 6, 1999.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Mid Coast TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Mid Coast Forest District office.

Public Review Process and Response

Mid Coast District staff actively solicited public input on the Timber Supply Review in the Mid Coast TSA through the following actions:

- direct mail-out of 49 copies of the Information Report and/or Data Package and 66 copies of the 1999 Analysis Report and/or Public Discussion Paper to forest licensees, small businesses, government agencies, local governments, First Nations, public interest groups and individuals.
- the Information Report, Data Package, 1999 Analysis Report and Public Discussion Paper were available at the district office in Bella Coola and the regional office in Nanaimo.
- meetings regarding both the Data Package and Analysis Report were held with representatives from First Nations and the forest industry.
- local and regional media were provided with news releases to encourage articles on the Timber Supply Review.

As Table 1 shows, more than 45 individuals attended information sessions and open houses. The Mid Coast Forest District also received eight written submissions on the *Data Package* and five submissions on the *Analysis Report* (see Appendix 1).

Activity (No. of participants)	Date
Information sessions	
Forest industry	
Interfor (teleconference) (16)	Aug. 24, 1999
Heiltsuk Tribal Council (10)	May 1998 & July 15, 1999
Oweekeno, Nuxalk, Kita-soo Tribal Council (9)	July 16, 1999

Continued

Activity (No. of participants)	Date
Public meeting	
Cedar Inn, Bella Coola (15)	May 27, 1998
Bay Hotel, Hagensborg (11)	July 5, 1999

Table 1: Participation in public information activities

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Mid Coast TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors

Three forest industry submissions question the criteria used to define the land base available for helicopter logging, saying the criteria are conservative and don't reflect current practice. In particular, these submissions point out that hemlock and balsam stands form a major component of the volume that has been and will continue to be harvested by helicopter, and suggest the criteria to define heli-logging areas should reflect this. For example, an Interfor submission says that company has logged and plans to log several hemlock-leading areas with volumes below 500 cubic metres per hectare.

Since operability is strongly influenced by market conditions, Western Forest Products proposes the use of three operability classifications: operable during below average market conditions; operable during average market conditions; and operable during above average market conditions.

One Interfor submission recommends a sensitivity analysis for the Outer Coast area to determine the increased area available for harvest if thresholds changed to 400 cubic metres per hectare for hemlock/balsam stands and 375 cubic metres per hectare for cedar and cypress stands which have a higher economic value.

An individual submission says no harvesting should occur in intact valleys until decisions about their future are made, including park creation, native land claims, wildlife habitat and tourism potential. This submission also expresses support for the creation of more parks such as the proposed Spirit Bear Conservation Area and Great Bear Rainforest.

An Interfor submission maintains that the netdown of 7.6 per cent from the timber harvesting land base to account for roads, trails and landings is too high. The company says research by the Ministry of Forests shows that the productivity loss is on average only half the area of actual site degradation, due to tree canopy closure over roads and trails. In addition, Interfor notes the 7.6 per cent netdown does not account for the increasing amount of helicopter logging, which requires fewer roads. Interfor says a netdown of four per cent is appropriate for the Mid Coast TSA.

Forest Inventory Factors

An Interfor submission says the large amount of current old growth in this TSA dictates that the new adjusted site indices be used in the base case harvest forecast.

The economic development officer for the Central Coast Regional District notes that over the past 20 years harvesting has been concentrated in large stands of the preferred species growing primarily on better and more accessible sites. The species mix has been eroded, according to this submission, and now hemlock-balsam and old-growth cedar predominate.

Expected Rate of Growth and Productivity

Interfor is of the opinion that since planting has been underway in the Mid Coast TSA since the mid-1970s, managed stand yield tables should be applied to Douglas-fir (age class 1 and 2), hemlock/balsam (age class 1) and cedar (age class 1).

The regional district submission says the expected rate of growth is based on flawed assumptions, as follows. First, there is no commitment to silviculture (beyond free-to-grow) in this TSA, so assuming growth on best site conditions is inaccurate. Second, young second-growth forests will not become targets for a second harvest because they will not be economic to heli-log or to justify reactivation of roads. Third, Forest Renewal BC funds are being managed by major licensees and their interests will be given priority (e.g., best sites, closest to current facilities and markets).

Minimum Harvestable Age

An Interfor submission recommends that the minimum harvestable age for all species be the age at which the estimated growth rate is within five per cent of the maximum annual growth rate (culmination age). The company says this is consistent with the approach used in other TSAs (Fraser, Soo and North Coast). Piece size (the 30 centimetre minimum diameter) should be a secondary objective, according to Interfor.

Regeneration Delay

An Interfor submission says the regeneration delay for hemlock/balsam on good and medium sites should be reduced to two years since these sites will be fully planted.

Wildlife

An individual submission notes that the Mid Coast TSA contains most of the last, largest, untouched watersheds in B.C. with the last and largest populations of grizzly, black and Kermode bears. This individual says increased access will increase hunting and poaching of bears, and other species will also be endangered by harvesting.

Interfor says the company was unaware a Deer Management Plan was being developed or that specific requirements for deer were needed. Until licensees are given an opportunity for input, Interfor says the proposed plan cannot be considered current practice and cannot be included in this timber supply review.

Interfor is also of the opinion that wildlife tree patches are u[illegible]ecessary in this TSA because of the large amount of inoperable area and riparian reserves and management areas. The regional district submission says constraints to protect and maintain fish and wildlife habitat is a key consideration in this TSA and must apply to denning areas and summer and winter ranges.

Environmentally Sensitive Areas

Two forest industry submissions express concerns about reductions to the land base to account for environmentally sensitive areas, particularly soil-related sensitivity. Interfor and Western Forest Products say the 90 per cent netdown for steep areas should be reduced because it underestimates the land base that could be available for helicopter logging. A second Interfor submission requests the Ministry of Forests undertake a study to verify the netdowns for soils similar to one done in TFL 38 that resulted in significant reductions in netdowns.

Interfor also requests information on how much area is contained within areas designated as environmentally sensitive for recreation.

Non-Recoverable Losses

The regional district submission expresses the opinion that until proper utilization standards are enforced, waste billing will increase as it will be cheaper to pay for waste than attempt to utilize it. The regional district provides recommendations to improve utilization of waste wood.

First Nations

In its submission, the Heiltsuk Tribal Council maintains the Crown has not fulfilled its fiduciary responsibility to the Heiltsuk, to ensure their aboriginal rights are protected and given expression.

Socio-Economic Factors

The regional district submission makes extensive comments on this topic. Some of the key points are as follows:

- timber harvesting should not be constrained because of other unregulated activities such as mushroom picking, botanical forest products, etc. Without regulation, these activities provide no direct economic benefit to the Crown
- it is wrong to assume that continuing to export 40-year-old logs from the Mid Coast TSA will provide meaningful, well-paid family employment.
- while the rate of heli-logging has increased by 200 per cent, only about 10 jobs have been created.
- there is no long-term vision for product development or marketing of existing stands.

The regional district submission identifies many reasons why socio-economic objectives for the region and the province cannot be met, and proposes several solutions. The regional district believes that without drastic change, the Mid Coast TSA will continue to experience severe hardship, loss of residents, reduced community income, loss of students, higher than average welfare rolls and greater social problems.

An individual submission says jobs can be created while harvesting less wood by encouraging small businesses engaged in value-added activities (including non-traditional forest uses) and selective harvesting. The Ocean Falls Citizen Committee says the central coast has a rapidly expanding human population that will require employment. The committee suggests dedication of an ongoing supply of wood to communities (through community forest licenses or other management structure).

Timber Supply Area Analysis Report

Expected Rate of Growth and Volume Estimates

The regional district submission advises caution regarding growth projections for second-growth forests and says a culmination age of 40 years is not workable due to the lack of commitment to silviculture in this TSA. The regional district also notes a need for better productivity information for cedar on the Outer Coast, prior to setting a harvest level.

Land Base Factors

Interfor expresses its support for inclusion of new areas suitable for helicopter logging in the timber harvesting land base and in general agrees with the criteria used to select these areas. The company's submission says the long-term forecast for helicopter logging over the next 50 years is reasonable, as is the use of the revised operability harvest forecast. Little Valley Forest Products says the timber supply analysis's conservative forecasts and skepticism regarding future harvesting of marginal timber types are well-founded, based on past performance.

The Sierra Club of BC says increases in heli-logging areas and the inclusion of large areas of low and poor productivity sites are not substantiated by historical harvest patterns or current economic projections. The club's submission cites recent Ministry of Forests figures that indicate it is uneconomic to log on 70 per cent of the central coast. The Sierra Club recommends that the contribution of these marginal stands be limited to the long-term timber supply (as discussed on page 38 of the *Analysis Report*) and that a conservative estimate of volumes be used. The club says the patchy nature of these forests plus the lack of

spatial modelling in this timber supply analysis is further reason why inclusion of these marginal sites is questionable.

Interfor expresses support for a partition of the harvest if it results in enhanced access to heli-logging areas. Interfor notes that study areas and the temporary deferral of other operating areas are affecting their business plan in the Mid Coast TSA, and encourages the government to bring the Central Coast protected areas process to a speedy conclusion.

The Sierra Club says it can reasonably be expected that the internationally recognized conservation values of this area will result in relatively large areas of land being set aside for purposes other than timber production, and this should be reflected in this timber supply review.

Biodiversity

In its submission, Interfor says it is inappropriate to model constraints on harvesting in order to meet older-forest habitat requirements. The company says the availability of suitable habitat outside the timber harvesting land base makes retention of older forests on the operating land base unnecessary.

The Sierra Club says the important social and ecological values of healthy ecosystems are largely ignored in the timber supply analysis. Their submission says the Forest Practices Code does not protect areas of concentrated biodiversity (especially riparian areas) due to the preponderance of old, but not necessarily ecologically critical, forest types outside the timber harvesting land base. The club cites continued overcutting, the ongoing conversion of old growth forests into plantations and the concentration of harvesting in valley bottoms as evidence that international commitments to the protection of biodiversity are being undermined.

Socio-Economic Factors

The regional district submission notes that while many First Nations are dependent on the fishing industry, non-native communities are tied to the economy of forestry, as well as tourism and government. The regional district says many individuals rely on the social safety net and forestry self-employment is declining due to problems with the Small Business Forest Enterprise Program.

The regional district submission provides a variety of data documenting negative changes in the local forest-based economy. One example is a loss of $2 million per year in wages due to lay-offs, transfers and reduced harvesting by Interfor, the largest employer of local residents. The regional district says forestry-related employment dropped by 25 per cent from 1986 to 1991, and dropped again in 1998 by 15 per cent.

In general the regional district says the socio-economic analysis is very soft, doesn't reflect the predicaments of local communities and shows a lack of sensitivity to the crisis situation in the Mid Coast TSA.

The Sierra Club makes several comments on the socio-economic aspects of the timber supply analysis:

- the economic contribution of non-timber forest values is not considered in the analysis.
- local economic development and local communities will not benefit from maintaining a high rate of harvesting, since the fibre is processed outside the Mid Coast TSA.
- the long-term economic options within local communities are undermined by the ongoing conversion of old growth stands to short rotation plantations and by the continuing practice of high-grading (evident from a comparison between the natural species profile and the harvested volumes by species).

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The Heiltsuk Tribal Council submission says they have not been consulted and informed as required by recent court cases, noting that the Heiltsuk Nation represent at least 70 per cent of the population in the TSA. The Council requests a meeting with the Ministry of Forests to discuss their concerns.

The Ocean Falls Citizen Committee says that while they are concerned about various issues (visual quality, tenures, careless treatment of red alder, large clearcuts, access management, tourism values), they don't have the resources to respond in detail. The committee suggests a review of timber supply should be accompanied by an analysis of demand, market trends, etc. They say how the timber supply is managed is very important, but why it is managed and for what objectives is even more important.

Interfor expresses concern about the application of sensitivity analyses in the timber supply analysis. The company says sensitivity analyses are useful to test different scenarios but, used for modelling purposes, they can lead to inappropriate conclusions when applied to operating conditions.

The Sierra Club expresses concern that no sensitivity analysis was conducted on the aggregated effects of various assumptions (i.e., a worst case scenario). The club says this puts communities at risk in the short and long term.

Forest Tenures and Apportionment

The Heiltsuk Tribal Council submission notes that under current plans, virtually all timber in the Mid Coast TSA is allocated to third parties. The Council says the Heiltsuk people have not been given the opportunity, as directed by the Supreme Court in Delgamuukw, to participate in resource development within their traditional territory.

Durfeld Log Construction expresses the opinion that too much wood is held by too few, and that the huge potential of the logbuilding industry is stymied by the difficulty of accessing old-growth coastal cedar. The company says larger areas for selective logging must be identified and cutting rights awarded based on jobs created and value earned from the trees harvested.

Little Valley Forest Products says harvesting rights should be tied to employment levels and no job reductions by major licensees should occur without a corresponding downward adjustment in harvesting rights. The company says the partitioned cut and part of the Forest Reserve should be added to the existing Small Business Forest Enterprise Program and be available on a competitive basis to the value-added sector, community forestry, local community-based industry and First Nation forestry and manufacturing. Little Valley also proposes incentives that could be used to encourage licensees to work in the Outer Coast and to utilize height class 3 trees.

The Central Coast Regional District submission says timber licences are archaic forms of tenure that continue to make sustainable forestry and stabilization of the local workforce impossible. The regional district says companies utilizing the major part of the AAC must be financially sound, provide the greatest number of jobs per cubic metre, and have a long-term vision that includes a corporate or environmental ethic on the ground. The regional district is of the opinion that the chief forester has the ability to ensure that ethics, certification and solid products in high demand are achieved. The regional district submission also notes that the small business program allocation in the Mid Coast TSA is the smallest in the province (nine per cent of the AAC) and says a streamlined small business program is the only opportunity for successful forest sector

development. The regional district says stumpage fees, high development costs and poor stands are currently barriers to success of the small business program.

Harvest Levels

An individual submission says the current AAC is 81 per cent over the sustainable level and must be reduced to that level immediately. This individual says overcutting and clearcutting are detrimental to water quality, fish habitat, grizzly bear habitat, slope stability, etc.

Little Valley Forest Products says that with full operation of their new manufacturing plant, they intend to vigorously pursue harvesting of historically marginal forest types. The company urges the chief forester to increase the partitioned AAC from the current level of 130,000 cubic metres per year to 180,000.

A submission from the Ministry of Small Business, Tourism and Culture says, based on the information provided, they believe the appropriate AAC should be two-thirds to three-quarters of the current level. This submission says harvesting large volumes on the Outer Coast will harm scenic values, and yet will not have a positive effect on Crown revenues or forestry interests, due to the marginal economic value of this wood and the poor growing sites. The ministry also says a significant probable outcome of the Central Coast Land and Resource Management Plan is stronger regulations concerning visual management, particularly in the Outer Coast, yet this is not accounted for in the analysis.

The Central Coast Regional District submission says the AAC should not be determined until the following issues are resolved: protected areas, parks and special management zones; biodiversity provisions; grizzly bear and black-tailed deer winter range; visual quality objectives for the Discovery Coast and other contentious areas; and seral stage requirements. If it is not possible to wait, the regional district says the AAC should be set at the long-run sustainable yield (770 000 cubic metres per year). This submission says a high AAC should not be fixed for five years due to a lack of information.

The Sierra Club says the Chief Forester must consider the effects of a transition from conventional clearcutting to variable-retention forestry resulting from changes in societal attitudes and the international marketplace. For example, the higher harvest costs associated with variable-retention methods may further limit the economic viability of many marginal sites. The club also says maintaining an unsustainable rate of cut (as well as overcutting, depletion of natural capital, loss of biodiversity and high-grading) will result in indefensible consequences to First Nations and local communities, contrary to the mandate of both the Chief Forester and the Crown. The Sierra Club also requests that this AAC determination be revisited after completion of the Central Coast Land and Resource Management Plan.

First Nations

The Oweekeno-Kitasoo-Nuxalk Tribal Council does not accept the authority of the Chief Forester to determine an AAC for the area, expressing the desire to establish a sustainable harvest level for each of their traditional territories. They say past harvesting in the Bella Coola valley has left only marginally economic areas for harvest, and the current licensing structure directs benefits from harvesting in their traditional territories to the Lower Mainland area, with little or no perceived benefit to the primarily First Nations Mid Coast population. They therefore question the Crown's social and economic objectives for the area. The tribal council says the Mid Coast TSA harvest should be reduced immediately or over 10 years to 500 000 or 550,000 cubic metres to avoid drawing down the timber capital while treaty negotiations are underway.

The Heiltsuk Tribal Council is concerned about the impact of the AAC on their traditional territory, and about the potential implications for First Nations treaties from future AACs that will be based on the Central Coast Land and Coastal Resources Planning process. They disagree with the Mid Coast socio-economic report.

Both Tribal Councils note the poverty and high unemployment levels (80 to 90 per cent) of First Nation members who reside in the Mid Coast TSA and indicate a strong interest in expanding their participation in the forest industry.

The Sierra Club expresses the opinion that continued alienation of lands and resources from traditional territories is unjust. Referring to the statement in the *Analysis Report* that in the next decade up to 90 per cent of harvesting will concentrate in good and medium productivity sites, the Club says this is essentially a resource grab by the Crown prior to the fair settlement of First Nations jurisdictional and land title issues.

Management

An individual submission expresses the opinion that the Forest Practices Code is inadequate to protect B.C. forests, and asks that clearcutting be ended completely.

The submission from the Central Coast Regional District provides numerous critiques and recommendations regarding forest management in the Mid Coast TSA. Some of these include:

- take a cautious approach with small cedar on Outer Coast lowlands;
- discontinue heli-logging of inner coast preferred species at 50 cents per cubic metre; this reduces employment and revenue to the province and does not contribute to good management;
- companies should not be allowed to harvest without a solid financial plan; without that, they may high-grade to achieve short-term financial survival.

Appendix 1

Submissions received by the Mid Coast Forest District

Submissions received on the Data Package

First Nations
Heiltsuk Tribal Council

Local government
Central Coast Regional District, Economic Development Commission

Industry
International Forest Products Ltd. (2)
Western Forest Products Ltd.
Durfeld Log Construction

Interest groups
Ocean Falls Citizen Committee

General public
One individual submission

Submissions received on the Analysis Report

Local government
Central Coast Regional District, Economic Development Commission

Government agencies
Ministry of Tourism, Small Business and Culture (Tourism Policy and Land Use Branch)

Industry
International Forest Products Ltd.
Little Valley Forest Products Ltd.

Interest groups
Sierra Club of BC